

Presentment Date and Time: October 19, 2015 at 12:00 noon (Prevailing Eastern Time)
Objection Deadline: October 19, 2015 at 11:30 a.m. (Prevailing Eastern Time)

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re: : Chapter 11
: Case No. 08-13555 (SCC)
LEHMAN BROTHERS HOLDINGS INC., *et al.* :
: Debtors. : (Jointly Administered)
: :
-----x

**NOTICE OF PRESENTMENT OF REVISED SECOND STIPULATED CLAIMS
LITIGATION SCHEDULE FOR THE OBJECTION OF DEBTORS AND DEBTORS IN
POSSESSION TO CLAIMS OF QVT FUND LP AND QUINTESSENCE FUND L.P.**

PLEASE TAKE NOTICE that the undersigned will present the annexed Revised Second Stipulated Claims Litigation Schedule for the Objection of Debtors and Debtors in Possession to Claims of QVT Fund LP and Quintessence Fund L.P. (the “Claims Litigation Schedule”) to the Honorable Shelley C. Chapman, United States Bankruptcy Judge, for signature on **October 19, 2015 at 12:00 noon (Prevailing Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that unless a written objection to the proposed Stipulated Scheduling Order, with proof of service, is served and filed with the Clerk of the Court and a courtesy copy is delivered to (i) the Bankruptcy Judge's chambers and (ii) the undersigned, so as to be received by **October 19, 2015 at 11:30 a.m. (Prevailing Eastern Time)**, the Stipulated Scheduling Order may be signed.

Dated: October 12, 2015
New York, New York

Respectfully submitted,

/s/ Ryan J. Andreoli
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Laura W. Sawyer
Ryan J. Andreoli
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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re: : Chapter 11
:
LEHMAN BROTHERS HOLDINGS INC., *et al.* : Case No. 08-13555 (SCC)
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Debtors. : (Jointly Administered)
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REVISED SECOND STIPULATED CLAIMS LITIGATION SCHEDULE

WHEREAS, on February 11, 2015, the Court so-ordered the Parties' stipulated Claims Litigation Schedule for the Objection of Debtors and Debtors in Possession to the Claims of QVT Fund LP and Quintessence Fund L.P. [Docket No. 48190] (the "Claims Litigation Schedule");

WHEREAS, the Parties have met and conferred and agreed to extend various deadlines in the Claims Litigation Schedule;

NOW, THEREFORE, the Parties hereby stipulate and agree to modify the Claims Litigation Schedule as follows:

1. All fact discovery shall be completed by February 12, 2016.
2. Initial document productions pursuant to agreed search terms and other agreements between the parties must commence on a rolling basis no later than October 12, 2015. The parties' document productions shall be substantially completed by November 6, 2015.
3. Privilege logs shall be served on or before December 7, 2015.
4. Depositions of fact witnesses must be completed no later than February 12, 2016.
5. Interrogatories pursuant to Local Bankruptcy Rule 7033-1(c) and requests for admissions will be served at least 30 days prior to close of discovery.

6. QVT Fund LP and Quintessence Fund L.P. (collectively, "QVT") shall disclose the identities of any of its testifying expert witnesses and serve any expert reports pursuant to Federal Rule of Civil Procedure 26(a)(2)(B) on March 11, 2016.

7. Depositions of experts disclosed pursuant to paragraph 6 must be completed no later than April 8, 2016.

8. Debtors shall disclose the identities of any of their testifying expert witnesses and serve any expert reports pursuant to Federal Rule of Civil Procedure 26(a)(2)(B) on May 13, 2016.

9. Depositions of experts disclosed pursuant to paragraph 8 must be completed no later than June 10, 2016.

10. The parties shall serve any rebuttal expert reports on July 8, 2016.

11. Depositions of experts disclosed pursuant to paragraph 10 must be completed no later than August 5, 2016.

12. As required by applicable rules, if a party wishes to file a dispositive motion, that party shall request a pre-motion conference with respect to such motion on or before August 19, 2016.

13. The Claims Hearing regarding the Claims of QVT Fund LP and Quintessence Fund L.P. shall commence on September 19, 2016.

Dated: October 12, 2015
New York, New York

/s/ Laura Washington Sawyer

Jayant W. Tambe
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Ryan J. Andreoli

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*Attorneys for Debtors and
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Dated: October 12, 2015
New York, New York

/s/ Dennis H. Tracey, III

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*Attorneys for QVT Fund LP and
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Dated: October , 2015
New York, New York

SO ORDERED

UNITED STATES BANKRUPTCY JUDGE